

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF IOWA

IN RE:  QHC FACILITIES, LLC, <i>et al.</i> ,  Debtors.	Chapter 11 Bankruptcy Case No. 21-01643  <b>SUPPLEMENTAL STATUS REPORT</b>
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COMES NOW Cedar Healthgroup, LLC ("Cedar Health"), a party in interest and creditor in this case, and provides a supplemental status report to the Court.

1. On November 10, 2022 the Court held a Zoom status hearing on Cedar Health's pending Motion for Summary Judgment, Dkt. 322, and related filings. One issue the Court posed was the impact, if any, of the unsigned/signed management agreements. The Court afforded Cedar Health and the Debtor the opportunity to submit a supplemental briefing.

2. Having considered the issue, Cedar Health provides this notice that it will not file a supplemental brief. The language and prerequisites that govern sale deposit forfeiture are set forth plainly in the APA as Cedar Health previously briefed in detail, which agreed standards the Debtor did not satisfy as a matter of law. Cedar Health is appreciative of the opportunity the Court afforded for a supplemental briefing, but stands on its prior submissions.

WHEREFORE, Cedar Health respectfully prays this Court accept this Supplemental Status Report, and for such other relief as may be just and proper under the premises.

/s/ Abram V. Carls  
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ATTORNEYS FOR CEDAR HEALTHGROUP, LLC

**Certificate of Service**

The undersigned certifies, under penalty of perjury, that on December 5, 2022, the foregoing document was electronically filed with the Clerk of Court using the Southern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of this case.

\_\_\_\_\_/s/ Abram V. Carls